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Attorneys for Plaintiff,  
**ALLYSON NICHOLE BURNETT**

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

## WESTERN DIVISION

## ALLYSON NICHOLE BURNETT

Plaintiff,

V.

ADAM YOUNG D/B/A OWL  
CITY, MATT THIESSEN, BRIAN  
LEE, UNIVERSAL MUSIC  
GROUP, INC., SONGS MUSIC  
PUBLISHING, LLC, CARLY RAE  
JEPSEN, SCHOOLBOY  
RECORDS, LLC, AMERICAN  
SOCIETY OF COMPOSERS,  
AUTHORS AND PUBLISHERS,  
BROADCAST MUSIC, INC., and  
SESAC, INC.

## Defendants.

CASE NO. 2:12-cv-09203-DSF-VBK

**STIPULATION OF RELEASE OF  
FUNDS DEPOSITED WITH THE  
CLERK OF COURT BY BROADCAST  
MUSIC, INC.**

[Rule 67, Fed. R. Civ. P.]

Honorable Dale S. Fischer

## **STIPULATION**

This stipulation is entered into by and among Plaintiff Allyson Nichole Burnett (“Burnett”) and non-party Broadcast Music, Inc. (“BMI”) and is entered into with respect to the following facts:

1. Pursuant to this Court’s January 2, 2013 Consent Order [DE 26] (the “BMI Consent Order”), consented to by Burnett and BMI, BMI has paid into the registry of the Court certain funds constituting royalties for the song “Good Time” (BMI Work No. 14225487) as would otherwise be payable pursuant to BMI’s distribution rules.

2. BMI represents and warrants that as of the date of this Stipulation it has deposited a total of \$804,156.06 (the “Deposited Funds”) with the Clerk of Court pursuant to the BMI Consent Order.

3. Burnett and BMI agree that the Deposited Funds shall be transferred and released from the registry by the Clerk of the Court and shall be made payable to the following account:

Mitchell Silberberg & Knupp LLP – New York Client Trust Account

Bank of America

592 5th Avenue

New York, NY 10017

ABA #: 026009593

Account # 483 014 794 356

1  
2       4. Burnett and BMI agree that BMI's obligations under the BMI Consent  
3 Order shall hereby cease and BMI may hereafter distribute royalties for the song  
4 "Good Time" (BMI Work No. 14225487) pursuant to BMI's ordinary distribution  
5 rules.

6  
7       5. The parties further stipulate that the dismissal of BMI, previously  
8 without prejudice, shall, effective the date of this Stipulation, become a dismissal  
9 WITH prejudice.

10  
11       IT IS SO STIPULATED AND AGREED.

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13       DATED: January 30, 2014

14       Respectfully Submitted,

15                   GRAHAM & JENSEN, LLP

16  
17       By: /s/ Raegan M. King

18                   Jason W. Graham

19                   Raegan M. King

20                   Attorneys for Plaintiff

21                   JOHNSON & JOHNSON LLP

22                   Neville L. Johnson

23                   Douglas L. Johnson

24                   James T. Ryan

25                   Local counsel for Plaintiff

1  
2 DATED: January 30, 2014  
3  
4

Respectfully Submitted,

5 TROYGOULD  
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8  
9 By: /s/ AnnMarie Mori  
10 Ann Marie Mori (SBN 217835)  
11  
12

13 Attorneys for Non-Party Broadcast  
14 Music, Inc.  
15  
16

17 **Attestation Regarding Signatures**  
18

19 The undersigned attests that all signatories listed, and on whose behalf this  
20  
21 filing is submitted, concur in this filing's content and have authorized its filing.  
22  
23

24 Dated:

25 /S/ Raegan M. King  
26 Raegan M. King, Esq.  
27  
28

## **CERTIFICATE OF SERVICE**

This is to certify that I have this day served the following parties in this matter with a copy of the foregoing via the Court's CM/ECF notification system to:

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This is to certify that I have this day served the following non-parties in this matter with a copy of the foregoing via email and U.S. Mail to:

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[Signature on following page.]

1  
2 DATED: January 30, 2014  
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4

Respectfully Submitted,  
5  
6 GRAHAM & JENSEN, LLP  
7  
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5 By: /s/ Raegan M. King  
6 Jason W. Graham  
7 Raegan M. King  
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Attorneys for Plaintiff

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Local counsel for Plaintiff